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May 12, 2022

VIA ELECTRONIC MAIL

William H. Davidson, II
Davidson, Wren, & Demasters, P.A.
1611 Devonshire Drive, Second Floor
Columbia, SC 29204

Re: DHD Jessamine, LLC v. Florence County, et al.
Case No.: 4:22 -cv-01235-JD

Dear Will:

I am in receipt of your Motion to Dismiss or in the Alternative Motion for a More Definite Statement. I find both of these Motions to be out of the ordinary and devoid of substance, but the focus of this correspondence is solely your FRCP Rule 12(e) Motion for a More Definite Statement. As I am sure you are aware, you had a duty to consult with me prior to filing your Motion for a More Definite Statement pursuant to Local Rule 7.02. Prior to responding to your motion, I wanted to reach out to you to consult regarding the motion to see if you can provide me with some clarity as to what exactly it is you are seeking, in an effort to find common ground and avoid wasting the Court's time.

FRCP Rule 12(e) provides that A party may move for a more definite statement of a pleading to which a responsive pleading is allowed but which is **so vague or ambiguous that the party cannot reasonably prepare a response**. The motion must be made before filing a responsive pleading and **must point out the defects complained of and the details desired**. (Emphasis added). Please identify the specific paragraphs of Plaintiff's Complaint that you contend are so vague and ambiguous that Defendants cannot reasonably prepare a response and point out the specific defects you believe are lacking from Plaintiff's Complaint and the details that you desire in order to be able to reasonably prepare a response.

Please provide a response to this letter by the close of business on May 16, 2022.

With best regards,

s/ Taylor

Taylor Powell